

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 1:17-cv-00365-DAE-AWA
	)	
GRANDE COMMUNICATIONS	)	
NETWORKS LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS' OBJECTIONS AND COUNTER-DESIGNATIONS TO  
DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S  
DEPOSITION DESIGNATIONS**

Plaintiffs submit the following Objections and Counter-Designations to Defendant Grande Communications Networks, LLC's Deposition Designations pursuant to the Court's Order Resetting Jury Trial and Related Deadlines (ECF No. 366). Plaintiffs reserve the right to amend these objections and counter-designations, and to interpose additional objections and counter-designations, based on evidence or arguments that Grande presents or attempts to present at trial.

<b>Code</b>	<b>Objection</b>
A	Argumentative
ATTY	Attorney objections/colloquy not removed
AA	Asked and answered/duplicative
BER	Best Evidence Rule
C	Compound
CC	Calls for conclusion
D	Designation incomplete; incomprehensible
IH	Improper hypothetical
SM	Subject to a pending/forthcoming motion
M	Misstates prior testimony
NR	Non-responsive
O	Overbroad
V	Vague and ambiguous
30(b)(6)	Outside the scope of the Fed. R. Civ. Proc. 30(b)(6) deposition topics for which witness was designated
103	Assumes facts not in evidence
104	Lacks foundation

402	Not relevant
403	Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.
408	Settlement Negotiations
501	Privilege
602	Calls for speculation; speculative
611c	Leading
701	Improper opinion by lay witness
702	Improper opinion by expert
802	Hearsay
901	Not properly authenticated

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Respectfully submitted,

By: /s/ Andrew H. Bart  
 Andrew H. Bart (admitted *pro hac vice*)  
 Jacob L. Tracer (admitted *pro hac vice*)  
**Jenner & Block**  
 1135 Avenue of the Americas  
 New York, NY 10036  
 Telephone: (212) 891-1600  
 Facsimile: (212) 891-1699  
 abart@jenner.com  
 jtracer@jenner.com

Robert B. Gilmore (admitted *pro hac vice*)  
 Philip J. O'Beirne (admitted *pro hac vice*)  
 Michael A. Petrino (admitted *pro hac vice*)

Kevin J. Attridge (admitted *pro hac vice*)

**Stein Mitchell Beato & Missner LLP**

901 15<sup>th</sup> Street, N.W., Suite 700

Washington, DC 20005

Telephone: (202) 737-7777

Facsimile: (202) 296-8312

rgilmore@steinmitchell.com

pobeirne@steinmitchell.com

mpetrino@steinmitchell.com

kattridge@steinmitchell.com

Daniel C. Bitting (State Bar No. 02362480)

Paige A. Amstutz (State Bar No. 00796136)

**Scott Douglass & McConnico LLP**

303 Colorado Street, Suite 2400

Austin, TX 78701

Telephone: (512) 495-6300

Facsimile: (512) 495-6399

dbitting@scottdoug.com

pamstutz@scottdoug.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 30, 2021, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

/s/ Daniel C. Bitting  
Daniel C. Bitting